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COUNSEL FOR UNIFIED FIELD SERVICES, INC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CASE NO. 22-31641-MVL-7
	§	
GOODMAN NETWORKS, INC.,	§	
	§	
DEBTOR.	§	CHAPTER 7
<hr/>		
SCOTT M. SEIDEL, TRUSTEE,	§	
PLAINTIFF	§	
	§	
V.	§	
	§	ADVERSARY NO. 23-03088-MVL
UNIFIED FIELD SERVICES, INC.	§	
DEFENDANT	§	

**DEFENDANT UNIFIED FIELD SERVICES, INC.'S RESPONSES TO TRUSTEE'S FIRST SET OF
POST-JUDGMENT INTERROGATORIES**

TO: **SCOTT M. SEIDEL, TRUSTEE**, Plaintiff herein, by and through his attorneys of record,
Davor Rukavina, Munsch Hardt Kopf & Harr, PC, 500 N. Akard St., Suite 4000, Dallas,
Texas 75201

Comes now Unified Field Services, Inc. Defendant herein (hereinafter "**UFS**" or "**Defendant**") and serves upon Scott M. Seidel, Trustee ("**Trustee**" or "**Plaintiff**"), its *Responses to Trustee's First Set of Post-Judgment Interrogatories to Defendant*.

Dated: April 24, 2024

Respectfully submitted,

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**ATTORNEYS FOR DEFENDANT UNIFIED FINANCIAL
SERVICES, INC.**

RESPONSES TO
FIRST SET OF POST-JUDGMENT INTERROGATORIES

INTERROGATORY NO. 1:

Identify all of the bank accounts currently held in Your name or for Your benefit and any such bank accounts held at any time since January 1, 2020. The foregoing includes the name of the bank, the account number, and the holder of the account.

RESPONSE:

Encore Bank - Acct. No. 700192297 - Unified Field Services, Inc., Operating Account

Encore Bank - Acct. No. 700192305 – Unified Field Services, Inc., Payroll Account

INTERROGATORY NO. 2:

Provide an accounting of all assets currently owned by You, including but not limited to, any cash equivalents, real property, personal property, contracts, accounts receivable, and potential or pending causes of action.

RESPONSE: To the best of my knowledge and belief, there are no assets currently owned by UFS.

INTERROGATORY NO. 3:

Identify with specificity all holders of security interests or liens encumbering any of Your assets at any time since January 1, 2020, and, for each holder of such encumbrance, the collateral, amount, and method of such security interest or lien.

RESPONSE: I am unaware of any current holders of any such security interests or liens. Per a UCC search of Unified Field Services, Inc., conducted April 19, 2024, using the Texas Secretary of State's online database, there are no UCC Financing Statements on file that identify Unified Field Services, Inc. as a debtor.

INTERROGATORY NO. 4:

Identify any individuals or entities with knowledge of Your financial status, whether or not they are currently employed by You or a current or former preparer of Your financial information, including the most recent contact information for each.

RESPONSE:

Former CFO: Zachary Wiebe
zachary.wiebe@deviceservicesgroup.com
210-823-0940

310 Wilmeth Road, Suite 100
McKinney, TX 75071

Current Accountant: Melissa Novak
accounting@managelife.co
210-487-0999
711 W. Brackenridge St.
Edna, TX 77957

Tax Preparers: Yessica Perez
210-760-1640
Calvetti Ferguson
700 Louisiana St. # 2500
Houston, TX 77002

INTERROGATORY NO. 5:

Identify all individuals who assisted You with Your responses to the Trustee's Requests for Production, and Interrogatories.

RESPONSE:

Attorneys with Pulman, Cappuccio & Pullen, LLP
Cynthia Smith, General Counsel Contractor, Symbiont Ventures, LLC (formerly known as Goodman Investment Holdings, LLC).

INTERROGATORY NO. 6:

Identify all entities or individuals that are Affiliates, subsidiaries, owners, shareholders, or Insiders of You at any time since January 1, 2020.

RESPONSE:

Goodman Investment Holdings LLC is the sole shareholder of Unified Field Services, Inc.
Unified Field Services, Inc. has no subsidiaries.
See, UFS Org Chart produced in response to Trustee's document request.

INTERROGATORY NO. 7:

Provide an accounting of all assets Transferred by You outside the ordinary course of business since January 1, 2020, including but not limited to, any cash equivalents, real property, personal property, contracts, accounts receivable, and potential or pending causes of action.

RESPONSE: See, Asset Purchase Agreement dated June 4, 2021.

INTERROGATORY NO. 8:

Identify each person (by name, title, address, phone number, and e-mail address) who was a director or officer of You at any time since January 1, 2020 and state the amount of compensation, expense reimbursements, and dividends or distributions paid to each such person during such time.

RESPONSE:

4/07/2021 John (Scot) Brunke appointed as sole Director
Joseph Hart IV appointed as CEO and President.

10/29/2021 John (Scot) Brunke removed as Director

James Goodman appointed as Sole Director.
Jake Goodman appointed as President
Joseph Hart IV appointed as CEO
Brad Kozma appointed as CFO

6/23/2022 Lewis A. Walker III appointed as additional Director.

INTERROGATORY NO. 9:

Identify all of Your current contractual counterparties or trade partners, whether or not such relationship was a result of the APA or TSA.

RESPONSE: None.

INTERROGATORY NO. 10:

For the individuals or entities identified in Interrogatory 9, identify the balance of the outstanding trade accounts, whether owed by You or the individual or entity identified above.

RESPONSE: None.

INTERROGATORY NO. 11:

Identify each person who provided accounting services to you at any time since January 1, 2020, including any auditor, internal accountant, outside accountant, or tax accountant, by name, firm, or current contact information, and the services that such person provided to You, and when.

RESPONSE: See, Response to Interrogatory No. 4.

INTERROGATORY NO. 12:

Explain the relationship between Goodman Investment Holdings and You, including with respect to the Notes as enumerated by the APA.

RESPONSE: Goodman Investment Holdings was the sole shareholder of UFS.

INTERROGATORY NO. 13:

Identify whether any additional Seller's Notes, as defined in the APA, are currently held or were purchased by You.

RESPONSE: I have reviewed Section 2.2 of the APA and found no definition of additional Seller Notes.

INTERROGATORY NO. 14:

Do you still have any business operations? If not, identify the circumstances by which You ceased any such business operations, including the date(s), the reason(s) why, whether any such business operations or underlying assets were Transferred by You, and to whom, why, and for what consideration.

RESPONSE: None.

INTERROGATORY NO. 15:

Explain why You did not make payment on the amounts owed to the Debtor that formed the basis for this Adversary Proceeding.

RESPONSE: UFI terminated operations and ran out of cash.

INTERROGATORY NO. 16:

Does any person owe You any money (whether by way of refund, contract, promissory note, lawsuit, unearned retainer, insurance claim, or otherwise) and, if so, by whom, for what and for how much.

RESPONSE: To the best of my knowledge and belief, no.

INTERROGATORY NO. 17:

Identify any lawsuit that you have been involved in in any capacity at any time since January 1, 2020, including by name of court, proceeding number, and party names and capacities.

RESPONSE: To the best of my knowledge and belief, the only lawsuit in which UFS is or was a party is this adversary proceeding.

INTERROGATORY NO. 18:

What happened to the business and/or the assets you acquired from the Debtor pursuant to the APA?

RESPONSE: The funds received from the Debtor went to pay overhead expenses.

INTERROGATORY NO. 19:

How were you capitalized? Your answer should include the identity of persons capitalizing you and their capital contributions.

RESPONSE: To the best of my knowledge and belief, Unified Field Services, Inc. was capitalized only by the loan from Goodman Investment Holdings, LLC in the amount \$2,250,000, as evidenced by the March 1, 2022 Promissory Note in that same amount from Unified Field Services, Inc. to Goodman Investment Holdings, LLC.

INTERROGATORY NO. 20:

Identify any payment made by You or on Your behalf to any creditor of You since January 1, 2023, including the name of such creditor, the amount of such payment, and reason for such payment (such as whether the payment was for goods, services, or otherwise). You may exclude wages and salaries to anyone who was not a director, officer, or Insider.

RESPONSE: To the best of my knowledge, none.

INTERROGATORY NO. 21:

Identify each payment or Transfer made by You since January 1, 2020 to any Affiliate, Insider, equity owner, director, or officer, including the date of such payment or Transfer, the amount thereof, and the reason for the same, and also including any return consideration You received for such payment or Transfer.

RESPONSE: To the best of my knowledge, Unified Field Services, Inc. made some loan payments in 2022 to Goodman Investment Holdings, LLC pursuant to the March 1, 2022 Promissory Note in the amount of \$2,250,000 from Unified Field Services, Inc. to Goodman Investment Holdings, LLC.

INTERROGATORY NO. 22:

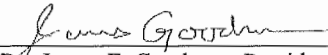
Identify any return consideration You received for any Transfer the subject of Interrogatory No. 7.

RESPONSE: The "Acquired Assets" as such are defined in Article I of the Asset Purchase Agreement.

STATE OF TEXAS
COUNTY OF BEXAR §

BEFORE ME, the undersigned authority, on this day personally appeared John M. Goodman, President of Defendant Unified Field Services, Inc., who, being duly sworn on his oath, deposed and said that he is duly authorized to answer Defendants' interrogatories in his capacity as president of Unified Field Services, Inc., that he has read the above and foregoing answers; and that based upon the best of his information and belief all factual statements contained therein are true and correct.

UNIFIED FIELD SERVICES, INC.


By: James E. Goodman, President

SUBSCRIBED AND SWORN to before me on the ____ day of _____ 2024 to certify which witness my hand and official seal.

Notary Public
In and for the State of Texas

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on the 24th day of April, 2024, a true and correct copy of the foregoing document was served on counsel of record for Trustee/Plaintiff in the manner and method indicated below.

Via email: drukavina@munsch.com;
tberghman@munsch.com; cwhite@munsch.com

Munsch Hardt Kopf & Harr, P.C.

Attn: Davor Rukavina

Thomas D. Berghman,

Conor P. White

4000 Ross Tower

500 N. Akard Street

Dallas, Texas 75201

/s/ Randall A. Pulman

Randall A. Pulman

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GOODMAN NETWORKS, INC.,	§	
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DEBTOR.	§	CHAPTER 7

SCOTT M. SEIDEL, TRUSTEE,	§	
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	§	
V.	§	
	§	ADVERSARY NO. 23-03088-MVL
UNIFIED FIELD SERVICES, INC.	§	
DEFENDANT	§	

**DEFENDANT UNIFIED FIELD SERVICES, INC.'S OBJECTIONS AND RESPONSES TO TRUSTEE'S
FIRST SET OF POST-JUDGMENT REQUESTS FOR PRODUCTION**

TO: **SCOTT M. SEIDEL, TRUSTEE**, Plaintiff herein, by and through his attorneys of record,
Davor Rukavina, Munsch Hardt Kopf & Harr, PC, 500 N. Akard St., Suite 4000, Dallas,
Texas 75201

Comes now Unified Field Services, Inc. Defendant herein (hereinafter "**UFS**" or "**Defendant**") and serves upon Scott M. Seidel, Trustee ("**Trustee**" or "**Plaintiff**"), its *Objections and Responses to Trustee's First Set of Post-Judgment Requests for Production to Defendant*.

Dated: April 24, 2024

Respectfully submitted,

PULMAN, CAPPUCCIO & PULLEN, LLP
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**ATTORNEYS FOR DEFENDANT UNIFIED FINANCIAL
SERVICES, INC.**

RESPONSES TO
FIRST SET OF POST-JUDGMENT REQUESTS FOR PRODUCTION

REQUEST NO. 1:

Any and all bank statements for any bank accounts held in Your name or for Your benefit since January 1, 2020 through the present.

RESPONSE:

Documents responsive to this request and included in Defendant's current production are bates labeled Seidel UFS 000001 - 000165

REQUEST NO. 2:

Documents and records evidencing any and all of Your assets, including but not limited to any cash, cash equivalents, real property, personal property, contracts, accounts receivable, and potential or pending causes of action, since January 1, 2020.

RESPONSE:

Documents responsive to this request are included in the documents previously produced by Defendant.

Documents responsive to this request and included in Defendant's current production include, but may not be limited to, those documents bates labeled Seidel UFS 000717-000722, 001159-001165.

REQUEST NO. 3:

All Financial Documents of Yours, including any QuickBooks or accounting files in native format, since January 1, 2020.

RESPONSE:

Documents responsive to this request are included in the documents previously produced and are also included in the current production of documents.

REQUEST NO. 4:

All corporate governance documents since January 1, 2020, including any amendments thereof, and including Your articles of incorporation and bylaws, and including any records of any meeting of Your board (including any minutes, resolutions, presentations made to the board, and any other document by which any action or approval of the board was sought or made).

RESPONSE:

Documents responsive to this request are bates labeled Seidel UFS 000550-619, 001281-1283.

REQUEST NO. 5:

Communications discussing or related to, directly or indirectly, payments made by You to any Affiliates or Insiders of You since January 1, 2020.

RESPONSE:

Documents responsive to this request are included in the documents previously produced and are included in the current production of documents.

REQUEST NO. 6:

Documents or records reflecting any accounts receivable or other sums or amounts due to You under any contract or agreement.

RESPONSE:

Documents responsive to this request are included in the documents previously produced and are included in the current production of documents.

REQUEST NO. 7:

Any Documents reflecting an organizational chart outlining the structure of Your business, including the hierarchy of employees and related entities, since January 1, 2020.

RESPONSE: A UFS organizational chart is included in the produced documents bates labeled Seidel UFS 000841.

REQUEST NO. 8:

All of Your tax returns filed with any governmental authority since January 1, 2020.

RESPONSE: 2021 and 2022 Federal Tax Returns are included in the current document production.

REQUEST NO. 9:

Communications by and between You and the Debtor or any third-party related to the assets purchased by You under the APA or the services provided by the Debtor to You pursuant to the MSA.

RESPONSE:

To the extent such communications exist they are included in the produced documents.

REQUEST NO. 10:

Documents and Communications evidencing any distribution or transfer of funds to Your equity holders since January 1, 2020, whether by way of dividend, distribution, or repayment of

loan or capital, including any document giving rise to such payment or evidencing any obligation to make such payment.

RESPONSE:

Such documents and communications, if any, are included in the produced documents.

REQUEST NO. 11:

Documents and records evidencing any security interest or lien currently encumbering any asset of Yours, including but not limited to any financing agreements, factoring agreements, or judgment liens.

RESPONSE:

See response to Interrogatory No. 3.

REQUEST NO. 12:

For all individuals or entities identified in your response to Interrogatory Number 9, Documents and records evidencing the relationship between You and the identified party.

RESPONSE:

To the best of my knowledge and belief, to the extent such documents and records exist they are included in the produced documents.

REQUEST NO. 13:

All Documents and Communications evidencing or related to any Transfer of any of Your property since January 1, 2020 outside the ordinary course of Your business, including any related letter of intent, term sheet, or asset purchase agreement.

RESPONSE:

To the best of my knowledge and belief, to the extent such documents and communications exist they are included in the produced documents.

REQUEST NO. 14:

Documents and Communications relating to any cessation of Your business operations.

RESPONSE:

See document bates labeled Siedel UFS 001352. To the best of my knowledge and belief, the extent other documents and communications related to this request exist they are included in the produced documents.

REQUEST NO. 15:

Documents and Communications related to any repayment of Your debt since January 1,

2022.

RESPONSE:

To the best of my knowledge and belief, no such documents exist, however, to the extent such documents and records may exist they are included in the produced documents.

REQUEST NO. 16:

Documents evidencing or related to any funds that any person may owe you, including any promissory note and security instrument, letter of credit, refund, general intangible, or commercial tort.

RESPONSE:

To the best of my knowledge and belief, no such documents exist, however, to the extent such documents and records may exist they are included in the produced documents.

REQUEST NO. 17:

All Communications between You and the Debtor regarding the APA or the TSA including any amounts owed by You thereunder.

RESPONSE:

To the best of my knowledge and belief, to the extent such documents and records exist they are included in the produced documents.

REQUEST NO. 18:

All insurance policies held in Your name or under which You were a payee or loss payee since January 1, 2020, including any director's and officer's coverage.

RESPONSE:

Copies of insurance policies responsive to this request were included in the documents initially produced by Defendant.

REQUEST NO. 19:

All documents and communications between You and any insurance carrier or broker evidencing or related to any claim You made on any insurance policy at any time since January 1, 2020.

RESPONSE: To the best of my knowledge and belief, no such documents or communications exist.

REQUEST NO. 20:

Your current listing of accounts payable or other funds owed by you to any person for any reason, including the amount of such funds that is claimed as owing, and the name and contact information of such person or creditor.

RESPONSE:

To the best of my knowledge and belief, no such listing exists.

REQUEST NO. 21:

All documents and communications between You and Amazon.com Services, Inc. or other contract counterparties pursuant to the contracts and businesses you acquired under the APA, related to any transfer, assignment, termination, alleged breach, renewal, non-renewal, amendment, or modification of any such contract or business.

RESPONSE:

To the best of my knowledge and belief, to the extent such documents and communications exist, they are included in the produced documents.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on the 24th day of April, 2024, a true and correct copy of the foregoing document was served on counsel of record for Trustee/Plaintiff in the manner and method indicated below.

Via email: drukavina@munsch.com;
tberghman@munsch.com; cwhite@munsch.com

Munsch Hardt Kopf & Harr, P.C.

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/s/ Randall A. Pulman

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